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October 6, 1987

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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3  
Docket No. 50-382  
Containment Integrated Leak Rate Test Duration

Gentlemen:

In accordance with Appendix J to 10CFR50 and our Technical Specifications, a Type A containment integrated leak rate test (ILRT) will be performed during the upcoming refueling outage at Waterford 3. With your concurrence, LP&L intends to perform a reduced duration ILRT (i.e. less than 24 hours retained pressure) at this outage and in the future.

The Waterford 3 Technical Specifications and 10CFR50 Appendix J direct that Type A leak rate testing be conducted using the methods and provisions of ANSI N45.4-1972, "Leakage Rate Testing of Structures for Nuclear Reactors". Both ANSI N45.4-1972 and the Waterford 3 FSAR (Section 6.2.6.1) specify a test period of 24 hours of retained internal pressure with the following qualification:

If it can be demonstrated to the satisfaction of those responsible for the acceptance of the containment structure that the leakage rate can be accurately determined during a shorter test period, the agreed-upon shorter period may be used.

In support of reduced duration ILRTs the Bechtel Corporation submitted (in November, 1972) the topical report BN-TOP-1, "Testing Criteria for Integrated Leak Rate Testing of Primary Containment Structures for Nuclear Power Plants". The report established criteria for the test duration based on stabilization or decline of the leak rate with time in turn based on the observed upper bound 95% confidence limit being less than 75% of the allowable leak rate in no less than six hours.

In reviewing BN-TOP-1, the NRC concluded that the testing criteria met the requirements of 10CFR50 Appendix J and ANSI 45.4-1972, and were acceptable for referencing by licensees. The results of the NRC review are contained in a Topical Evaluation Report transmitted by letter dated February 1, 1973 from De Young (NRC) to Allen (Bechtel Corporation).

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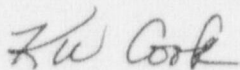
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Waterford 3 will adopt the methodology described in BN-TOP-1 for the second refueling outage and subsequent ILRTs. Consequently, we request your concurrence to revise the test duration from 24 hours to a period consistent with BN-TOP-1 criteria. It should be noted that approval of this approach does not require a Technical Specification change nor an exemption to 10CFR50 Appendix J.

In order to support our schedule for the second refueling outage we request completion of your review by the end of the year. Should you require further information, please feel free to contact Mike Meisner at (504) 595-2832.

Your very truly,



K.W. Cook  
Nuclear Safety & Regulatory  
Affairs Manager

KWC:MJM:ssf

Enclosure: Application Fee - \$150

cc: R.D. Martin, J.H. Wilson, J.A. Calvo, W.M. Stevenson, E.L. Blake,  
NRC Resident Inspector's Office (W3)